

McMANIMON, SCOTLAND & BAUMANN, LLC

75 Livingston Avenue, Suite 201

Roseland, New Jersey 07068

(973) 622-1800

Anthony Sodono, III, Esq. (asodono@msbnj.com)

Michele Dudas, Esq. (mdudas@msbnj.com)

Sari B. Placona, Esq. (splacona@msbnj.com)

*Attorneys for Anthony Sodono, III, Temporary Receiver***UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

THEFBAMACHINE INC., a corporation;

PASSIVE SCALING INC., a corporation;

SALES.SUPPORT NEW JERSEY INC., a
corporation;

1HR DELIVERIES INC., a corporation;

HOURLY RELIEF INC., a corporation;

3PL LOGISTIC AUTOMATION INC., a
corporation;

FBA SUPPORT NJ CORP., a corporation;

DAILY DISTRO LLC, a limited liability
company;CLOSTER GREEN CORP., doing business as
WRAITH & CO., a corporation; andBRATISLAV ROZENFELD, also known as
Steven Rozenfeld and Steven Rozen,
individually and as an officer or owner of
THEFBAMACHINE INC., PASSIVE
SCALINING INC., SALES.SUPPORT NEW
JERSEY INC., 1HR DELIVERIES INC.,

Civil Action No. 24-6635 (JXN) (LDW)

**CERTIFICATION OF SARI B.
PLACONA, ESQ., IN SUPPORT OF
RECEIVER'S APPLICATION TO
RETAIN (I) MCMANIMON, SCOTLAND
& BAUMANN, LLC AS ATTORNEYS
FOR THE RECEIVER; AND (II) EISNER
ADVISORY GROUP AS ACCOUNTANTS
TO THE RECEIVER PURSUANT TO 28
U.S.C. § 1746**

HOURLY RELIEF INC., 3PL LOGISTIC
AUTOMATION INC., FBA SUPPORT NJ
CORP., DAILY DISTRO LLC, and CLOSTER
GREEN CORP., doing business as WRAITH &
CO., a corporation,

Defendants.

SARI B. PLACONA, certifies, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney at law duly admitted to practice before this Court. I am a partner with the law firm of McManimon, Scotland & Baumann, LLC (“MSB”), which maintains offices for the practice of law at 75 Livingston Avenue, Suite 201, Roseland, New Jersey 07068.

2. This certification is submitted in connection with the proposed retention of MSB as counsel for Anthony Sodono, III, Temporary Receiver (“Receiver”) for The FBA Machine Inc., Passive Scaling Inc., Sales.Support New Jersey Inc., 1HR Deliveries Inc., Hourly Relief Inc., 3PL Logistics Automation Inc., FBA Support NJ Corp., Daily Distro LLC, Closter Green Corp d/b/a Wraith & Co., and Bratislav Rozenfeld aka Steven Rozenfeld and Steven Rozen (the “Receivership Entities”), under the *Ex Parte Temporary Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and Other Equitable Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue* (the “Order”) dated June 3, 2024. See ECF 5.

3. MSB possesses the requisite expertise in the fields of, among other things, litigation, general corporate, reorganization insolvency, bankruptcy, and other related matters.

4. Set forth below is the current basis for hourly time charges for services rendered by MSB based upon the experience level of attorneys:

Mr. Sodono³ - \$725.00 per hour
Ms. Dudas - \$560 per hour
Ms. Placona - \$525 per hour

³ MSB has agreed to a twenty percent (20%) rate reduction.

Attorneys range from \$250 to \$725 per hour and paralegals range from \$150 to \$250 per hours. All rates will be discounted by twenty percent (20%).

5. MSB reserves the right to adjust its hourly rates in the ordinary course of its business and to seek reimbursement for expenses and disbursements.

6. Neither I, the law firm, nor any member thereof insofar as I, after due inquiry, have been able to ascertain, is or has been a creditor, an equity security holder, an insider of the Receivership Entities, or has any other relationship with the Receivership Entities or its agents, creditors, or other parties in interest, or its respective attorneys. Moreover, MSB claims no interest in the suit or any of the parties thereto in any way which would disqualify it from serving the Receiver in good faith as a fiduciary for all of the beneficial owners and creditors of the estate, as contemplated by L. Civ. R. 66.1(g) of the Local Civil Rules of the United States District Court for the District of New Jersey.

7. Neither I, the law firm nor any member thereof, insofar as I, after due inquiry, have been able to ascertain, is or has been, a director, officer or employee of the Receivership Entities.

8. Neither I, the law firm, nor any member thereof, insofar as I, after due inquiry, have been able to ascertain, has an interest materially adverse to the interests of the Receivership Entities or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Receiver or the Receivership Entities.

9. Neither I, the law firm, nor any member thereof, insofar as I, after due inquiry, have been able to ascertain, holds or represents any interest materially adverse to the Receiver, the Receivership Entities in the matters upon which MSB is to be engaged.

10. Any and all fees and disbursements to MSB in connection with legal services rendered to the Receiver during the course of this proceeding will only be made after application and authorization by this Court, upon notice to the Receivership Entities, Federal Trade Commission, and other parties having filed a notice of appearance in this matter.

11. Neither I, the law firm, nor any member thereof, will, upon being retained, represent any other entity having an adverse interest in connection with this case.

I certify that the foregoing statements made by me are true and correct to the best of my knowledge, information, and belief.

/s/ Sari B. Placona
Sari B. Placona

Dated: June 13, 2024